

**NORTH CAROLINA DIVISION OF
AIR QUALITY**

Application Review

Issue Date: **DRAFT**

Region: Asheville Regional Office
County: Haywood
NC Facility ID: 4400159
Inspector's Name: Brendan Davey
Date of Last Inspection: 12/19/2018
Compliance Code: B / Violation - emissions

Facility Data

Applicant (Facility's Name): Blue Ridge Paper Products LLC

Facility Address:

Blue Ridge Paper Products LLC
 175 Main Street
 Canton, NC 28716

SIC: 2621 / Paper Mills Exc Building Paper

NAICS: 322121 / Paper (except Newsprint) Mills

Facility Classification: Before: Title V **After:**

Fee Classification: Before: Title V **After:**

Permit Applicability (this application only)

SIP: 02D .0501 only

NSPS:

NESHAP:

PSD:

PSD Avoidance:

NC Toxics:

112(r):

Other:

Contact Data

Facility Contact

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Application Data

Application Number: 4400159.18E

Date Received: 02/28/2018

Application Type: Modification

Application Schedule: TV-Significant

Existing Permit Data

Existing Permit Number: 08961/T25

Existing Permit Issue Date: 01/31/2019

Existing Permit Expiration Date: 10/31/2021

Total Actual emissions in TONS/YEAR:

CY	SO2	NOX	VOC	CO	PM10	Total HAP	Largest HAP
2017	5875.43	3418.59	1420.30	1830.70	558.09	823.95	624.44 [Methanol (methyl alcohol)]
2016	7195.93	4224.22	1377.79	1500.32	675.70	861.11	606.17 [Methanol (methyl alcohol)]
2015	7810.81	4325.84	1400.35	1549.11	711.16	798.89	599.37 [Methanol (methyl alcohol)]
2014	7593.86	4344.54	1481.26	2922.19	728.55	818.32	610.26 [Methanol (methyl alcohol)]
2013	8004.07	4284.98	1446.31	2975.07	726.96	813.89	602.82 [Methanol (methyl alcohol)]

Review Engineer: Joseph Voelker

Review Engineer's Signature:

Date:

Comments / Recommendations:

Issue 08961/T26

Permit Issue Date:

Permit Expiration Date:

I. Introduction and Purpose of Application

Evergreen Packaging operates Blue Ridge Paper Products, Inc. (BRPP), an integrated Kraft pulp and paper mill located in Canton, Haywood County, North Carolina. Blue Ridge Paper currently holds Title V Permit No. 08961T25 with an expiration date of October 31, 2021.

BRPP and North Carolina signed a Special Order of Consent (2007-002) that required BRPP to submit a complete permit application by March 31, 2018 including SO₂ emission limits and modeling that will demonstrate compliance with the one-hour SO₂ NAAQS.

The permit application submitted will be processed as a significant modification pursuant to 15A NCAC 02Q .0516.

II. Chronology

Date	Description
02/28/2018	Permit application received by the DAQ and assigned application no. .18E.
10/19/2018	ADD INFO email sent to Permittee requesting the Permittee propose specific monitoring that will ensure that modeling rates proposed in the application will not be exceeded.
11/29/2018	A letter was received by the DAQ containing the information requested on 10/19/2018
01/28/2019	A letter was received by the DAQ containing specific monitoring ranges for the SO ₂ scrubbers based on the recent source testing. Updated modeling results were also submitted that include revised dispersion parameters and emission rates based on information gathered during the performance tests
02/12/2019	An ADD INFO email from Nancy Jones of the AQAB was sent to the Permittee stating: <i>As shown in the attached files, the maximum modeled H4H 1-hour values of SO₂ occurred at the outer edge of the 100-meter spaced receptors. We need you to center another grid of more finely spaced receptors (no more than 100 meter spacing) over the location of the maximum values to determine whether this is truly the maximum or if a higher value occurs to the east.</i>
02/25/2019	An ADD INFO email from Joe Voelker was sent to the Permittee stating: <i>I understand Nancy Jones had requesting some revisions to the grid spacing. As I was reading the January 28, 2019 letter that accompanied the revised analysis, I note that you addressed the specific concern Brendan Davy brought up during the intial application submittal regarding the Riley Bark boiler dispersion parameters. Your letter stated that there were some typographical errors but it did not mention that the testing reaffirmed any initial assumptions regarding the modeled dispersion parameters for that source or any of the others or that any other changes were necessary. Since you had conducted testing after the initial modeling, was there any need to adjust any other dispersion parameters? Did the revised modeling include a review of the original modeling parameters? Please provide an explanation how the modeled dispersion parameters are consistent or could be deemed conservative with the stack parameters that were determined during the recent stack tests.</i>
04/02/2019	Revised modeling results requested on 02/12/2019 were received via certified mail. The report included a response to the questions posed in the 02/25/2019 email.
04/04/2019	A memo was issued by Nancy Jones of the AQAB approving the revised modeling analysis received on April 2, 2019.
05/16/2019	Draft permit sent to Permittee for review
07/03/2019	Comments received by the Permittee
MM DD YYYY	Public Notice published on NCDENR DAQ website; concurrent public/EPA comment period begins
MM DD YYYY	Public comment period ends. TBD
MM DD YYYY	EPA comment period ends. TBD

III. Modification Description

The purpose of this application is not to address any physical modifications but rather to incorporate emission limitations, monitoring and recordkeeping and reporting to ensure compliance with the 1-hour SO₂ National Ambient Air Quality Standard (NAAQS).

Background

On June 22, 2010, the EPA revised the primary sulfur dioxide (SO₂) National Ambient Air Quality Standard (NAAQS) (75 FR 35520). The EPA promulgated a new 1-hour daily maximum primary SO₂ standard at a level of 75 parts per billion (ppb), based on the 3-year average of the annual 99th percentile of 1-hour daily maximum concentrations.

On May 13, 2014, the EPA proposed the Data Requirements Rule (DRR) for the 1-Hour SO₂ NAAQS (79 FR 27445). The final DRR was promulgated on August 21, 2015 (80 FR 51051) and requires states to gather and submit to the EPA additional information characterizing SO₂ air quality in areas with larger sources of SO₂ emissions. In the DRR, air agencies have the choice to use either monitoring or modeling to characterize SO₂ air quality in the vicinity of priority SO₂ sources and submit the modeling and/or monitoring to the EPA on a schedule specified by the rule. The Canton Mill elected to conduct monitoring and installed an ambient monitor in close proximity to the mill.

The SO₂ ambient monitor is located on Pace Street in Canton approximately 50 meters (m) from the Canton Mill property line. After it was installed, the monitor began to show periodic SO₂ concentrations above the hourly standard of 75 ppb. In response, the Mill has investigated SO₂ emissions reduction strategies and made equipment and operational changes to reduce its ambient impact. These physical changes have been addressed in other permitting actions.

BRPP and North Carolina signed a Special Order of Consent requiring the Canton Mill to submit a permit application and modeling analysis by March 1, 2018 to characterize the Mill's emission sources and develop allowable SO₂ emission rates based on modeled predictions of ambient SO₂ concentrations.

Discussion

Table 3-1 in the application shows the emission rates used in the dispersion modeling analysis. Table 4-1 in the application shows the stack parameters used in the dispersion modeling analysis. Appendix B of the application shows the derivation of the maximum emission rates that correlate to the modeled emission rates in Table 3-1.

Appendix B of the application shows that that Riley Coal and the No.4 Power Boilers, AFTER CONTROL, represent 56% of the total SO₂ emissions modeled. Because at the time of the submittal the SOC-required scrubbers had not been installed nor tested, it was decided to put the application on HOLD until source testing confirmed the controlled emission rates and any proposed scrubber monitoring parameters. Likewise, the SOC required testing of the Riley Bark Boiler, No.10 Recovery Furnace and No. 11 Recovery Furnace contemporaneously as the Riley Coal and No.4 Power boiler testing. Thus, the processing delay of the permit application to allow for the modeled emission parameters and emission rates to be verified by actual source testing was further justified. According to Appendix B, these five emission sources are expected to account for approximately 93% of the modeled facility-wide SO₂ emissions.

Source testing was conducted on the Riley Coal Boiler, No.4 Power Boiler, Riley Bark Boiler, No. 10 Recovery Furnace and No. 11 Recovery Furnace during November and December 2018. Based on the test data, the modeling was revised (received on January 28, 2019) to account for higher than expected emission rates from the No. 10 Recovery furnace. The test data for the other sources was approximately the same or lower than the modeled emission rates, thus providing justification for the modeled rates.

With regard to the dispersion parameters, the revised modeling corrected two typographical errors with respect to the modeled velocity and stack temperature for the Riley Bark Boiler. In the letter submitted on April 2, 2019, the Permittee provided a comparison of the stack parameters (e.g., velocity and stack temperatures) for the five tested sources and compared them to the revised model stack parameters of January 28, 2019. It was concluded that the variability of the modeled parameters was between 7% less and 6% greater of the actual average parameters. Given the expected variability in stack temperatures and gas velocities in normal operation, these parameters were deemed adequate for modeling purposes.

On April 4, 2019, the AQAB of the DAQ issued a memo approving the final modeling analysis submitted which included the following table.

**Updated Modeling Results for the One-Hour SO₂ NAAQS Analysis for Blue Ridge Paper
Canton, Haywood County, North Carolina**

Pollutant/ Averaging Period	Years	Recovery Furnace Scenario	Modeled H4H Conc. (ppb)	Background Conc. (ppb)	Max. Conc. (µg/m ³)	NAAQS (ppb)	% of NAAQS
SO ₂ (1-hour)	2012- 2016	ULSD	71*	3	74	75	99.9%
		BLS	71		74		99.9%

*Documentation and files submitted lower concentrations than those obtained by adding the additional receptors to the previous modeling.

The table above shows the results at the location of maximum impact. A review of the data suggests that the results at the location of the ambient monitor on Pace Street to be on the order of 60% of the maximum impacts shown above.

The following table provides a summary of the derivation of the preliminary and final modeled emission rates and the results of the source tests.

Emission Rate Summary Table

Permit ID NO.	Source description	Control device		Limit or emission Factor, precontrol	Units	Emissions Basis	Activity Factor	Units	Control Efficiency for Pre- Control Emission Factors	Initial Modeled Emission Rate, lb/hr	Highest Actual One Hour Emission Rate During Test, lb/hr	3-hour Average Emission Rate During Test, lb/hr	Final Modeled Emission Rate, lb/hr	% of modeled emissions
G08020	No. 10 Recovery Furnace - BLS	ESP	Point	0.20	lb/TBLS	NCASI TB 1020, Table 4.11 Median	70	TBLS/hr	N/A	14.0	27.9	21.4	28.0	9.7
G08020	No. 10 Recovery Furnace - ULSD	ESP	Point	0.2	lb/1000 gal	AP-42 Table 1.3-1 (15 ppm S ULSD)	382	MMBtu/hr	N/A	0.54	*		**	0.2
G08021	No. 11 Recovery Furnace - BLS	ESP	Point	0.20	lb/TBLS	NCASI TB 1020, Table 4.11 Median	70	TBLS/hr	N/A	14.0	2.3	1.9	28.0	9.7
G08021	No. 11 Recovery Furnace - ULSD	ESP	Point	0.2	lb/1000 gal	AP-42 Table 1.3-1 (15 ppm S ULSD)	382	MMBtu/hr	N/A	0.54	*		**	0.2
G08023	No. 10 Smelt Dissolving Tank	Wet scrubber	Point	0.006	lb/TBLS	NCASI TB 1020, Table 4.15 Median	70	TBLS/hr	N/A	0.42	*		**	0.1
G08024	No. 11 Smelt Dissolving Tank	Wet scrubber	Point	0.006	lb/TBLS	NCASI TB 1020, Table 4.15 Median	70	TBLS/hr	N/A	0.42	*		**	0.1
G09028	No. 4 Lime Kiln	Wet scrubber	Point	314.0	lb/1000 gal	AP-42 Table 1.3-1 (2.0%S #6 oil)	60	MMBtu/hr	95%	6.3	*		**	2.2
G09029	No. 5 Lime Kiln	Venturi scrubber	Point	314.0	lb/1000 gal	AP-42 Table 1.3-1 (2.0%S #6 oil)	100	MMBtu/hr	95%	10.5	*		**	3.6
G11039	Riley Coal Boiler	ESP + Scrubber	Point	41.8	lb/ton	AP-42 Table 1.1-3 (1.1%S)	399	MMBtu/hr	90%	61.3	56.4	54.5	61.3	21.2
G11040	No. 4 Power Boiler	Multiple	Point	41.8	lb/MMBtu	AP-42 Table 1.1-3 (1.1%S)	535	MMBtu/hr	90%	82.2	71.4	69.3	82.2	28.4
G11042	Riley Bark Boiler	Venturi scrubber	Point			Maximum hourly emission rate				68.0	68.0	59.8	68.0	23.5
G12077	Calendar Nip Heaters	None	Point	6.00E-07	lb/scf	AP-42 Table 1.4-2	20,000	scf/hr	N/A	0.012	*		**	0.004
16-CU-001	1850 hp Backup Diesel Generator	None	Point	1.21E-05	lb/hp-hr	AP-42 Table 3.4-1 (15 ppm S ULSD)	1850	hp	N/A	0.022	*		**	0.008
I-G23066.f-ire	200 hp Fire Control Generator #1	None	Point	1.21E-05	lb/hp-hr	AP-42 Table 3.4-1 (15 ppm S ULSD)	200	hp	N/A	0.0024	*		**	0.001
I-G23066.f-ire	200 hp Fire Control Generator #2	None	Point	1.21E-05	lb/hp-hr	AP-42 Table 3.4-1 (15 ppm S ULSD)	200	hp	N/A	0.0024	*		**	0.001
I-G23066.f-gen	64 hp Lime Kiln Emergency Generator	None	Point	1.21E-05	lb/hp-hr	AP-42 Table 3.4-1 (15 ppm S ULSD)	64	hp	N/A	0.00078	*		**	0.0003
I-G23066.f-gen	227 hp Lime Kiln Emergency Generator	None	Point	1.21E-05	lb/hp-hr	AP-42 Table 3.4-1 (15 ppm S ULSD)	227	hp	N/A	0.0028	*		**	0.001
I-G23066.f-rec	Generator	None	Point	0.0015	lb/MMBtu	AP-42 Table 3.4-1 (15 ppm S ULSD)	0.94	MMBtu/hr	N/A	0.0014	*		**	0.0005
G08022	Black Liquor Oxidation - RTO	None	Point	0.25	lb/hr	2007 RTO NOCS Stack Testing	10	multiplier	N/A	2.5	*		**	0.9
G11050	No. 1 Natural Gas Package Boiler	None	Point	0.6	lb/MMscf	AP-42 Table 1.4-2	225	MMBtu/hr	N/A	0.13	*		**	0.05
G11051	No. 2 Natural Gas Package Boiler	None	Point	0.6	lb/MMscf	AP-42 Table 1.4-2	225	MMBtu/hr	N/A	0.13	*		**	0.05

* - no testing in 2018 was conducted

** - no difference between initial and final modeled rate

These emission rates will be included in the permit as maximum allowable emission rates. The Permittee proposed the following monitoring on 11/29/2018 to ensure these emission rates will not be exceeded:

SO ₂ SOURCE	PROPOSED MONITORING	JUSTIFICATION
No. 10 Recovery Furnace – Black Liquor Solids firing (G08020)	Annual source test	Information indicates that emissions during normal operation are quite low and that emissions while the smelt bed is building up following startup are below the emission rate that models compliance. The salt fume in the furnace serves to control SO ₂ emissions.
No. 10 Recovery Furnace – Ultra-low Sulfur Diesel firing (G08020)	No proposed monitoring other than use of ULSD instead of No. 6 fuel oil	15 ppm sulfur modeled, SO ₂ from ULSD very low (<1.0 lb/hr)
No. 11 Recovery Furnace – Black Liquor Solids firing (G08021)	Annual source test	Information indicates that emissions during normal operation are quite low and that emissions while the smelt bed is building up following startup are below the emission rate that models compliance. The salt fume in the furnace serves to control SO ₂ emissions.
No. 11 Recovery Furnace – Ultra-low Sulfur Diesel firing (G08021)	No proposed monitoring other than use of ULSD instead of No. 6 fuel oil	15 ppm sulfur modeled, SO ₂ from ULSD very low (<1.0 lb/hr)

SO ₂ SOURCE	PROPOSED MONITORING	JUSTIFICATION
Black Liquor Oxidation System with RTO (G08022)	Retain existing SO ₂ compliance monitoring	Permit 08961T24, Condition 2.1.M.1.e contains PSD monitoring for SO ₂ and the modeled emission rate is 10 times higher than the tested emission rate.
No. 10 Smelt Dissolving Tank (G08023)	No proposed monitoring	PTE modeled using NCASI emission factor, SO ₂ from SDT very low (<1.0 lb/hr)
No. 11 Smelt Dissolving Tank (G08024)	No proposed monitoring	PTE modeled using NCASI emission factor, SO ₂ from SDT very low (<1.0 lb/hr)
No. 4 Lime Kiln (G09028)	Annual source test when burning NCG and/or SOG; if the results demonstrate emissions are less than 50% of the model emission rate the testing frequency may be reduced to once every five years, if the results demonstrate emissions are less than 1.0 lb/hr no further testing is required	The lime kiln provides inherent SO ₂ control and the Subpart MM and CAM monitoring already ensure proper operation of the wet scrubber. NCASI emission factor = 0.18 lb/hr and 1997 test result = 0.3 lb/hr (both an order of magnitude below the modeled rate)
No. 5 Lime Kiln (G09029)	Annual source test when burning NCG and/or SOG; if the results demonstrate emissions are less than 50% of the model emission rate the testing frequency may be reduced to once every five years, if the results demonstrate emissions are less than 1.0 lb/hr no further testing is required	The lime kiln provides inherent SO ₂ control and the Subpart MM and CAM monitoring already ensure proper operation of the wet scrubber. NCASI emission factor = 0.24 lb/hr and 1997 test result = 0.1 lb/hr (both an order of magnitude below the modeled rate)
Riley Coal (G11039)	Maintain 3-hr block average scrubber recirculation flow rate and 3-hr block average scrubber pH above average values during initial source test	Monitoring scrubber recirculation flow and pH will ensure future operation sufficient to stay below the modeled emission rate.
No. 4 Power Boiler (G11040)	Maintain 3-hr block average scrubber recirculation flow rate and 3-hr block average scrubber pH above average values during initial source test	Monitoring scrubber recirculation flow and pH will ensure future operation sufficient to stay below the modeled emission rate.
Riley Bark (G11042)	Maintain 3-hr block average scrubber recirculation flow rate and 3-hr block average scrubber pH above average values during initial source test conducted while firing coal only	Monitoring scrubber recirculation flow and pH will ensure future operation sufficient to stay below the modeled emission rate.
No.1 Natural Gas Package Boiler (G11050)	No proposed monitoring	PTE modeled using AP-42 emission factor, SO ₂ from natural gas very low (<1.0 lb/hr)

The proposed monitoring and operating limitations (with some additions) are discussed and summarized below:

- Natural gas fired only combustion sources, which have inherently low SO₂ emissions will not require any M/R/R.
- Internal combustion engines will be required to fire only ultra-low sulfur diesel fuel (15 ppm S, ULSD).
- No. 10 and No. 11 recovery furnaces have no control devices and will be subjected to annual source tests. The modeled rates are conservative estimates of the source testing conducted in December 2018. As seen in the summary table above the emission rates modeled represent 19.4% of the total modeled emission rates. Although each furnace modeled 27.9 lb/hr of SO₂ emissions, the permittee expects that for the majority of operating time for the furnaces to emit closer to 2.3 lb/hr as evidenced by the No. 11 recovery boiler test results. During startup these furnaces will be also limited to combusting only ULSD.

- No 4 and No. 5 lime kilns are controlled by wet scrubbers. The Permit already contains requirements for scrubbing liquid flow rate and pressure drop for the scrubbers under 15A NCAC 02D .0508 “Particulates From Pulp And Paper Mills” (Section 2.1 O.1.c through f), 02D .0614 “Compliance Assurance Monitoring” (Section 2.1 O.5) and 02D .1111 “Maximum Achievable Control Technology” (40 CFR 63 SUBPART MM, Section 2.2 D.1.e through p). Although the scrubbers are installed primarily for control of PM emissions, the Permittee expects their operation to contribute to the reduction of the SO₂ emissions. As such, the Permittee will be required to operate these scrubbers as currently permitted to ensure compliance with the modeled emission rates. To verify the modeled emission rates, the Permittee will be required to perform annual testing on these sources depending on the margin of compliance of the specific test with the modeled emission rate. Given that these sources contribute approximately 5.8% of the total modeled emissions, this approach seems reasonable.
- The smelt tanks based on the use of NCASI SO₂ emission factors are expected to contribute only 0.2 % of the modeled emissions. The Permit already contains requirements for scrubbing liquid flow rate and pressure drop for the scrubbers under 15A NCAC 02D .0524 New Source Performance Standards (NSPS Subpart BB, Section 2.1 N.3.d through f), 02D .0614 “Compliance Assurance Monitoring” (Section 2.1 N.4), 02D .1111 “Maximum Achievable Control Technology” (40 CFR 63 SUBPART MM, Section 2.2 D.1.e through p). Although the scrubbers are installed primarily for control of PM emissions, it is expected that their operation will contribute to the reduction of SO₂ emissions. As such, the Permittee will be required to operate these scrubbers as currently permitted to ensure compliance with the modeled emission rates. Given that these sources contribute approximately only 0.2% of the total modeled emissions no testing will be required.
- The SO₂ emissions from the black liquor oxidation system which includes a regenerative thermal oxidizer followed by a caustic scrubber, are limited to less than 40 tons per year via a PSD avoidance condition (see section 2.1 M.1). The scrubber is subject to typical M/R/R including scrubbing liquid flow rate and pH requirements. When the parameters in Section 2.1 M.1.i are maintained, the SO₂ emissions have been demonstrated to be 0.25 lb/hr (2007 compliance testing) and thus are assumed to be so for PSD avoidance calculation purposes. When the values are operated outside of this range, no control is assumed, and the emission rate is assumed to be **25 lb/hr**. Since the Permittee **modeled 2.5 lb/hr**, the Permittee will be required to operate the caustic scrubber subject to the operating parameters at Section 2.1 M.1.i **at all times**. No additional testing will be required since this source is expected to contribute less than 1% of the overall SO₂ emissions when the scrubber is operated in compliance with Section 2.1 M.1.i.
- Riley Bark boiler is equipped with a venturi-type wet scrubber. As discussed previously, SO₂ testing was completed in December 2018 and will be used to establish an allowable SO₂ emission rate and the appropriate scrubber monitoring parameters to ensure that emission rate will not be exceeded. Parameters for the venturi scrubber pressure drop, pH and liquid recirculation flow were memorialized in the source test memo issued by the AQAB on April 10, 2019. These values with typical M/R/R will be incorporated into the permit. This scrubber is also used for compliance with other regulations. However the recent testing was conducted only for SO₂ and therefore the parameters established in this test will not affect any other monitoring parameters elsewhere in the permit. Annual testing will be required, depending on the margin of compliance of the specific test with the modeled emission rate, given that with controls this source contributes approximately 23.5% of the total modeled SO₂ emissions.
- Riley Coal and No. 4 power boiler are equipped with caustic scrubbers. These scrubbers were permitted in permit No. 18 issued on March 29, 2016. Up through the current permit, operation of these scrubbers was not necessary for any applicable requirement. The emission rates modeled and the proposed operating parameters above were determined/verified during the performance testing in November and December 2018. Parameters for the scrubber pH and liquid recirculation flow were memorialized in source tests memo issued by the AQAB on April 10, 2019. These values with typical M/R/R will be incorporated into the permit. Annual testing will be required, depending on the margin of compliance of the specific test with the modeled emission rate, given that with controls these sources contribute approximately 21% and 28% of the total modeled SO₂ emissions.

IV. Regulatory Review

This permitting action is being undertaken to incorporate emission limitations, monitoring recordkeeping and reporting requirements to ensure compliance with 15A NCAC 02D .0501(c): COMPLIANCE WITH NATIONAL AMBIENT AIR QUALITY STANDARDS. See the discussion in Section III above. Any of the new emission limitations, monitoring and recordkeeping and reporting imposed in this permitting action will be used solely to ensure compliance with 02D .0501. No changes will be necessary to any other existing permit conditions.

V. NSPS, NESHAPS, PSD, Toxics, Attainment Status, 112(r), and CAM

The inclusion of SO₂ emission limitations, monitoring recordkeeping and reporting will not affect the compliance status with respect to these regulatory programs nor require a review of the existing permit conditions. As stated previously, the Permittee is in compliance with all these applicable regulations and the existing monitoring recordkeeping and reporting is adequate to ensure ongoing compliance with those regulations.

VI. Compliance History

DAQ has reviewed the compliance status of this facility. Due to the size and complexity of the paper mill, the inspections at Blue Ridge Paper are conducted in phases. The most recent inspection was conducted September 21, 2018. Brendan Davey of the Asheville Regional Office indicated that, at the time of the inspection, Blue Ridge Paper appeared to be in compliance with the requirements of the current permit for the sources that were the subject of the current inspection.

The following table shows the recent five-year compliance history.

Five-Year Violation History:			
Date	Letter Type	Rule Violated	Violation Resolution Date
10/09/2018	NOV/NRE	Permit Permit Condition	Pending
03/14/2017	NOV/NRE	Permit Late Report (excluding ACC)	Pending
03/14/2017	NOV/NRE	2D .0400 Ambient Air Quality Standards	Pending
03/14/2017	NOV/NRE	Permit Permit Condition	04/07/2017
03/14/2017	NOV/NRE	Permit Permit Condition	Pending
12/09/2016	NOV/NRE	2Q .0508 Permit Content	12/09/2016

The inclusion of these SO₂ emission limitations will be instrumental in resolving the violations with respect to 02D .0400 (i.e., the SO₂ Ambient Air Quality Standard).

VII. Changes Implemented in Revised Permit

Old Section No.	New Section No.	Description of Change(s)
Cover letter	Cover letter	<ul style="list-style-type: none"> Updated permit revision numbers and dates.
Permit page 3	same	<ul style="list-style-type: none"> Updated permit revision number, and permit issuance date.
Section 1 equipment list	same	<ul style="list-style-type: none"> Removed footnote b which reads “This control device is not necessary for compliance with any currently applicable regulation.”
Section 2.1	same	<ul style="list-style-type: none"> In all applicable sections referenced 2.2 J.1

Old Section No.	New Section No.	Description of Change(s)
2.1 T.2.d	Same	<ul style="list-style-type: none"> Revised the following language: The Permittee shall be deemed in noncompliance with 15A NCAC .0503 if the emissions are monitored and recorded as required above. to The Permittee shall be deemed in noncompliance with 15A NCAC .0503 if the emissions are not monitored and recorded as required above.
2.1 T and U	same	<ul style="list-style-type: none"> Removed asterisked language that reads <i>This control device is not necessary for compliance with any currently applicable regulation.</i> This language is no longer correct.
2.2.E		<ul style="list-style-type: none"> Removed the following note as it no longer applies: <i>NOTE: The wet scrubbers installed on Riley Coal and No. 4 Power Boiler are not necessary for compliance with any currently applicable regulation.</i>
NA	2.2 J	<ul style="list-style-type: none"> Added section to address all sources of SO2 emissions
NA	2.2 J.1	<ul style="list-style-type: none"> Added 02D .0501(c) condition including emission limitations, monitoring recordkeeping and reporting.

VIII. Public Notice/EPA and Affected State(s) Review

A notice of the DRAFT Title V Permit shall be made pursuant to 15A NCAC 02Q .0521. The notice will provide for a 30-day comment period, with an opportunity for a public hearing. Consistent with 15A NCAC 02Q .0525, the EPA will have a concurrent 45-day review period. Copies of the public notice shall be sent to persons on the Title V mailing list and EPA. Pursuant to 15A NCAC 02Q .0522, a copy of each permit application, each proposed permit and each final permit pursuant shall be provided to EPA. Also, pursuant to 02Q .0522, a notice of the DRAFT Title V Permit shall be provided to each affected State at or before the time notice provided to the public under 02Q .0521 above.

IX. Recommendations

TBD